

Abran E. Vigil
Nevada Bar No. 7548
Justin A. Shiroff
Nevada Bar No. 12869
BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135
Telephone: (702) 471-7000
Facsimile: (702) 471-7070
vigila@ballardspahr.com
shiroffj@ballardspahr.com

Attorneys for JPMorgan Chase Bank, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

vs.

SFR INVESTMENTS POOL 1, LLC, a Nevada
limited liability company; SEVEN HILLS
MASTER COMMUNITY ASSOCIATION, a
Nevada non-profit corporation; and
VENANCIO H. REYES, JR., an individual,

Defendants.

Case No.: 2:17-cv-00321-GMN-GWF

**STIPULATION AND ORDER TO
1)DISMISS CLAIMS BETWEEN
JPMORGAN CHASE BANK,
N.A., SEVEN HILLS MASTER
ASSOCIATION, AND SFR
INVESTMENTS POOL 1, LLC
WITH PREJUDICE, AND 2)
LIFT STAY ENTERED MARCH
21, 2018 [ECF NO. 39]**

SFR INVESTMENTS POOL 1, LLC, a Nevada
limited liability company

Counterclaimant/Cross-Claimant,

vs.

JPMORGAN CHASE BANK, N.A.;
MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC. AS NOMINEE
BENEFICIARY FOR COUNTRYWIDE
HOME LOANS, INC., a New York
corporation; REAL TIME RESOLUTIONS,
INC.,

Counter/Third-Party/Cross-Defendants.

1 Pursuant to Local Rules LR IA 6-2 and LR 7-1, Plaintiff/Counter-Defendant
2 JPMorgan Chase Bank, N.A. ("Chase"), Defendant/Counterclaimant/Cross-Claimant
3 SFR Investments Pool 1, LLC ("SFR"), and Defendant Seven Hills Master
4 Community Association (the "Association") (collectively, the "Parties"), through their
5 respective attorneys, stipulate as follows:

6 1. This action concerns title to real property commonly known as 1259
7 Panini Drive, Henderson, NV 89052 (the "Property") following a homeowner's
8 association foreclosure sale conducted on March 6, 2013, with respect to the Property.

9 2. As it relates to the Parties, a dispute arose regarding that certain Deed
10 of Trust recorded against the Property in the Official Records of Clark County,
11 Nevada as Instrument Number 20050728-0004446 (the "Deed of Trust"), and in
12 particular, whether the Deed of Trust continues to encumber the Property.

13 3. The Parties to this Stipulation have settled and agreed to release their
14 respective claims, and further agreed that the claims between them, including the
15 Complaint and Counterclaim, shall be DISMISSED with prejudice.

16 4. As Venancio H. Reyes, Jr. has not appeared in this action, Chase hereby
17 voluntarily dismisses its claims against him pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i).

18 5. Nothing in this Stipulation shall impact SFR's counterclaim against
19 Real Time Resolutions, Inc. nor Mortgage Electronic Registration Systems, Inc. as
20 Nominee Beneficiary for Countrywide Home Loans, Inc.

21 6. The Parties further stipulate and agree that the three Lis Pendens
22 recorded against the Property in the Official Records of Clark County, Nevada, as
23 Instruments Number 20131231-0000519, 20170329-0001446 and 20170713-0002324
24 be, and the same hereby are, EXPUNGED.

25 7. The Parties further stipulate and agree that the \$500 in security costs
26 posted by Chase on June 15, 2017 pursuant to this Court's Order [ECF No. 19] shall
27 be discharged and released to the Ballard Spahr LLP Trust Account.

8. The Parties further stipulate and agree that a copy of this Stipulation and Order may be recorded with the Clark County Recorder;

9. The Parties further agree to lift the stay entered March 21, 2018 [ECF No. 39];

10. Each party in this case number 2:17-cv-00321-GMN-GWF shall bear its own attorneys' fees and costs.

Dated: December __, 2018

BALLARD SPAHR LLP

KIM GILBERT EBRON

By: /s/ Justin A. Shiroff
Abran E. Vigil
Nevada Bar No. 7548
Justin A. Shiroff
Nevada Bar No. 12869
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

By: /s/ Jacqueline A. Gilbert
Diana S. Ebron
Nevada Bar No. 10580
Jacqueline A. Gilbert
Nevada Bar No. 10593
Karen Hanks
Nevada Bar No. 9578
7625 Dean Martin Dr., Suite 110
Las Vegas, Nevada 89014

Attorneys for JPMorgan Chase Bank, N.A.

*Attorneys for SFR Investments
Pool 1, LLC*

BOYACK, ORME & ANTHONY

By: /s/ Patrick A. Orme
Edward D. Boyack
Nevada Bar No. 5229
Patrick A. Orme
Nevada Bar No. 7853
7432 West Sahara Avenue, Suite 101
Las Vegas, Nevada 89117

*Attorney for Seven Hills Master
Community Association*

IT IS SO ORDERED.

DATED this 17 day of December, 2018.


Gloria M. Navarro, Chief Judge
United States District Court